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Of Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
Portland Division

THE ESTATE OF RICHARD JASON
FORREST, Van Loo Fiduciary Services, LLC,
Personal Representative,

Plaintiff,

v.

MULTNOMAH COUNTY, a political
subdivision of the state of Oregon; MICHAEL
REESE, Multnomah County Sheriff,
CAMILLE VALBERG, KOH METEA, JAMI
WHEELER, JACOB DIAMOND, STEVEN
ALEXANDER, JEFFREY WHEELER,
DERRICK PETERSON, and NICOLE
MORRISEY O'DONNELL, acting in concert
and in their individual capacities,

Defendants.

No. 3:20-CV-01689-AR

UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
REPLY TO MOTION FOR
SUMMARY JUDGMENT

LOCAL RULE 7-19(a) CERTIFICATION

Counsel for Defendants certifies that Plaintiff does not oppose this motion.

MOTION

Pursuant to Fed. R. Civ. P. 6(b) and Local Rules 7-1(f)(2), Defendants respectfully request the Court order that Defendants' Reply on Defendants' Motion for Summary Judgment is to be filed by June 7, 2024. This motion is for good cause and not for purposes of delay.

POINTS AND AUTHORITIES

Defendants' moved for summary judgment in June, 2023. (ECF 59). Plaintiff made unopposed motions or requests to extend their Response deadline (ECF 71, 89) and filed their Response April 5, 2024. (ECF 90). As noted, the case involves a dense factual record and many claims and parties. Additionally, counsel for Defendants returned from family leave on April 15th, 2024 and needs additional time to review the materials and complete a response in addition to other duties. (Declaration of B. Andrew Jones, ¶¶ 1 – 4).

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Plaintiff's counsel is amenable to a new reply date. As such, Defendants respectfully request the Court order the Defendants' time to Reply in support of their summary judgment motion is extended to June 7th, 2024.

DATED this 16th day of April, 2024.

Respectfully submitted,

JENNY M. MADKOUR, COUNTY ATTORNEY
FOR MULTNOMAH COUNTY, OREGON

/s/ B. Andrew Jones

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